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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 BFP INVESTMENTS 4, LLC,

Case No. 2:22-CV-00287-JAD-DJA

11 Plaintiff,

12 vs.

**STIPULATION AND ORDER TO EXTEND  
EXPERT DISCLOSURE DEADLINE**

13 NATIONSTAR MORTGAGE LLC, d/b/a MR.  
14 COOPER; QUALITY LOAN SERVICE  
15 CORPORATION; DOES 1-10; ROE  
16 ENTITIES 1-10,

**(First Request)**

17 Defendants.

18 The parties, by and through their undersigned counsel, stipulate and agree as follows:

19 **A. A statement specifying the discovery completed by the parties as of the date of  
the motion or stipulation**

20 SFR and Nationstar have exchanged initial disclosures and supplements.

21 SFR issued written discovery to Quality Loan Service Corporation. Quality responded.

22 SFR issued written discovery to Nationstar. Nationstar responded.

23 **B. A specific description of the discovery that remains to be completed**

24 Nationstar and/or Quality<sup>1</sup> issue written discovery

25 SFR's deposition

26 Nationstar's deposition

27 \_\_\_\_\_  
28 <sup>1</sup> On March 1, 2022, Quality filed a notice of non-monetary status. *See* ECF No. 8. On March 9, 2022, SFR filed an  
objection. *See* ECF No. 9. To date, the court has not ruled on the issue.

## Quality's deposition

## Disclosure of expert witnesses

**C. The reasons why the remaining discovery was not completed within the time limit of the existing discovery deadline**

On August 29, 2022, SFR issued written discovery to Quality and Nationstar. However, on October 3, 2022, Nationstar’s counsel realized his office was not aware of the discovery; it only came to his attention after BFP’s counsel requested a copy be emailed. As a result, BFP granted Nationstar a 30-day extension to respond to the written discovery. Thereafter, Nationstar requested additional time to respond to written discovery, and BFP granted Nationstar two weeks, but Nationstar did not provide its responses until November 18 and November 23. BFP was waiting on this first phase of discovery before moving on to expert discovery.

**D. Excusable Neglect why request was not made 21-days before deadline.**

BFP did not receive Nationstar's written discovery responses until November 18 and November 23. At the 21-day mark, (November 9, 2022) BFP was not aware Nationstar would not be responding until November 18 and 23. Even with the additional two-week extension, the deadline was November 17.

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1           **D. A proposed schedule for the completion of all remaining discovery**2           **Current Deadline**2           **Proposed Deadline**

3           Discovery Cut-Off: February 28, 2023

3           No change

4           Amending/Adding Parties: September 12, 2022

4           No change

5           Initial Experts: November 30, 2022

5           **December 14, 2022**

6           Rebuttal Experts: December 30, 2022

6           **January 17, 2022**

7           Dispositive Motions: March 28, 2023

7           No change

8           Pre-Trial Order: ~~February 13, 2023~~

8           No Change

9           **HANKS LAW GROUP**9           **TROUTMAN PEPPER HAMILTON  
10           SANDERS, LLP**11           */s/ Karen L. Hanks*12           Karen L. Hanks, Esq.  
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19           dba Mr. Cooper*18           **ORDER**19           Having reviewed the parties' Stipulation, the Court finds that the pretrial order deadline  
20           is incorrect. The deadline for filing the joint pretrial order is 30 days after the dispositive-  
21           motion deadline. Accordingly, the stipulation is **granted in part and denied in part**.  
22           The deadline within which to file the pretrial order is **April 27, 2023**. If dispositive  
23           motions are filed, the deadline for filing the joint pretrial order will be suspended until  
24           30 days after decision on the dispositive motions or further court order. IT IS SO  
25           ORDERED.

26           DATED this 9th day of December 2022.

27           28           DANIEL J. ALBREGTS  
                 UNITED STATES MAGISTRATE JUDGE